

EXHIBIT E

documents relating to any medical evaluation, diagnosis, and/or treatment for or relating to the “injury to [your] neck, back, and legs” that you sustained around “late June/early July 2019,” as alleged in Paragraph 151 of the Complaint. Please also complete and sign the Authorization for Release of Medical Information, attached hereto as Exhibit A for each such document,” as Plaintiff can not produce, identify, any documents that Plaintiff is not aware of and/or not in possession of. Subject to and without waiving the foregoing General and specific objections, and subject to a Protective Order that will be entered by the Court, Plaintiff will not produce documents responsive to the Request as they are not within Plaintiff’s possession, custody, or control that Plaintiff can locate after a reasonable diligent search and that have not already been produced by Plaintiff to Defendant. Plaintiff further responds that Plaintiff is not currently in possession of any nonprivileged documents that Plaintiff has not already produced to Defendant. Plaintiff further responds that Plaintiff is not currently in possession of any nonprivileged documents that Plaintiff has not already produced to Defendant. “Plaintiff does not have possession, custody, or control of any responsive documents.” Furthermore, Plaintiff’s medical records are privileged. Additionally,. Plaintiff further objects to this request on the grounds that it is not reasonably limited in temporal or geographic scope. Plaintiff further objects to this Interrogatory on the grounds that it calls for a legal conclusion and for an answer that is outside the scope of appropriate factual inquiry. Plaintiff further objects to this request to the extent it seeks information that is neither relevant to the claims and defenses of this matter nor proportional to the needs of the case. Plaintiff further objects to this Request on the grounds that it is irrelevant insofar as it relates to claims in this Action that have been dismissed. Plaintiff further objects to this Interrogatory on the grounds that the Interrogatory seeks confidential information regarding individuals who are not parties to this action, the disclosure of which would violate the privacy interests of such individuals. Defendant further objects to this Interrogatory to the extent it seeks information protected by the attorney-client, attorney work product and/or other applicable privileges, and/or doctor-patient privilege.

DR. Robbins

DEFENDANT DELTA’S REQUEST FOR PRODUCTION NO. 21:

Produce all documents and communications relating to any medical, psychological or psychiatric evaluation, diagnosis, counseling and/or treatment, or any other counseling or treatment for any mental or emotional distress (if any) you contend was caused by the unlawful conduct alleged in your Complaint. Please also complete and sign the Authorization for Release of Medical Information, attached hereto as Exhibit A for each such document.

PLAINTIFF’S OBJECTIONS & RESPONSES TO DEFENDANT DELTA’S REQUEST FOR PRODUCTION NO. 21: In addition to the foregoing General Objections stated above and incorporated herein, Plaintiff objects to this Request on the grounds that it is overbroad, unduly burdensome, and seeks irrelevant information, lacking sufficient particularity, and Defendant is seeking a fishing expedition.. Plaintiff further objects to this Request on the grounds that it is imprecise and/or lacking sufficient particularity. Plaintiff further objects to this Request on the grounds that it is disproportional to the needs of the case such that the burden and expense of responding outweigh the likely benefit. Plaintiff further objects to this Request on the grounds that it seeks documents that are not in Plaintiff’s possession, custody and/or control. Plaintiff further objects to this Request to the extent it seeks information protected by the attorney- client, attorney work product and/or other applicable privileges. Plaintiff further objects to this Request on the grounds that it is not reasonably limited in temporal scope. Plaintiff further object to this Request on the grounds that it seeks confidential, proprietary, or business information about Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks confidential information regarding individuals who are not parties to this action, the disclosure of which would violate the privacy interests of such individuals.

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Plaintiff further objects to this Request on the grounds that it is vague, speculative, premature, conclusory, and ambiguous in its use of the terms "Produce all documents and communications relating to any medical, psychological or psychiatric evaluation, diagnosis, counseling and/or treatment, or any other counseling or treatment for any mental or emotional distress (if any) you contend was caused by the unlawful conduct alleged in your Complaint. Please also complete and sign the Authorization for Release of Medical Information, attached hereto as Exhibit A for each such document," as Plaintiff can not produce, identify, any documents that Plaintiff is not aware of and/or not in possession of. Subject to and without waiving the foregoing General and specific objections, and subject to a Protective Order that will be entered by the Court, Plaintiff will not produce documents responsive to the Request as they are not within Plaintiff's possession, custody, or control that Plaintiff can locate after a reasonable diligent search and that have not already been produced by Plaintiff to Defendant. Plaintiff further responds that Plaintiff is not *currently in possession of any nonprivileged documents that Plaintiff has not already produced to Defendant.* Plaintiff further responds that *Plaintiff is not currently in possession of any nonprivileged documents that Plaintiff has not already produced to Defendant. "Plaintiff does not have possession, custody, or control of any responsive documents."* Furthermore, Plaintiff's medical records are privileged. Additionally, Plaintiff further objects to this request on the grounds that it is not reasonably limited in temporal or geographic scope. Plaintiff further objects to this Interrogatory on the grounds that it calls for a legal conclusion and for an answer that is outside the scope of appropriate factual inquiry. Plaintiff further objects to this request to the extent it seeks information that is neither relevant to the claims and defenses of this matter nor proportional to the needs of the case. Plaintiff further objects to this Request on the grounds that it is irrelevant insofar as it relates to claims in this Action that have been dismissed. Plaintiff further objects to this Interrogatory on the grounds that the Interrogatory seeks confidential information regarding individuals who are not parties to this action, the disclosure of which would violate the privacy interests of such individuals. Plaintiff further objects to this Interrogatory to the extent it seeks information protected by the attorney-client, attorney work product and/or other applicable privileges, and/or doctor-patient privilege.

DEFENDANT DELTA'S REQUEST FOR PRODUCTION NO. 22: To the extent not otherwise produced, produce all documents and communications that you retained from your employment with Delta.

PLAINTIFF'S OBJECTIONS & RESPONSES TO DEFENDANT DELTA'S REQUEST FOR PRODUCTION NO. 22: In addition to the foregoing General Objections stated above and incorporated herein, Plaintiff objects to this Request on the grounds that it is overbroad, unduly burdensome, and seeks irrelevant information, lacking sufficient particularity, and Defendant is seeking a fishing expedition.. Plaintiff further objects to this Request on the grounds that it is imprecise and/or lacking sufficient particularity. Plaintiff further objects to this Request on the grounds that it is disproportional to the needs of the case such that the burden and expense of responding outweigh the likely benefit. Plaintiff further objects to this Request on the grounds that it seeks documents that are not in Plaintiff's possession, custody and/or control. Plaintiff further objects to this Request to the extent it seeks information protected by the attorney-client, attorney work product and/or other applicable privileges. Plaintiff further objects to this Request on the grounds that it is not reasonably limited in temporal scope. Plaintiff further object to this Request on the grounds that it seeks confidential, proprietary, or business information about Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks confidential information regarding individuals who are not parties to this action, the disclosure of which would violate the privacy interests of such individuals. Plaintiff further objects to this Request on the grounds that it is vague, speculative, premature,

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conclusory, and ambiguous in its use of the terms "To the extent not other-wise produced, produce all documents and communications that you retained from your employment with Delta," as Plaintiff can not produce, identify, any documents that Plaintiff is not aware of and/or not in possession of. Subject to and without waiving the foregoing General and specific objections, and subject to a Protective Order that will be entered by the Court, Plaintiff will not produce documents responsive to the Request as they are not within Plaintiff's possession, custody, or control that Plaintiff can locate after a reasonable diligent search and that have not already been produced by Plaintiff to Defendant. **Plaintiff further responds that Plaintiff is not currently in possession of any nonprivileged documents that Plaintiff has not already produced to Defendant. "Plaintiff does not have possession, custody, or control of any responsive documents."** Furthermore, Plaintiff's medical records are privileged. Additionally, Plaintiff further objects to this request on the grounds that it is not reasonably limited in temporal or geographic scope. Plaintiff further objects to this Interrogatory on the grounds that it calls for a legal conclusion and for an answer that is outside the scope of appropriate factual inquiry. Plaintiff further objects to this request to the extent it seeks information that is neither relevant to the claims and defenses of this matter nor proportional to the needs of the case. Plaintiff further objects to this Request on the grounds that it is irrelevant insofar as it relates to claims in this Action that have been dismissed. Plaintiff further objects to this Interrogatory on the grounds that the Interrogatory seeks confidential information regarding individuals who are not parties to this action, the disclosure of which would violate the privacy interests of such individuals. Defendant further objects to this Interrogatory to the extent it seeks information protected by the attorney-client, attorney work product and/or other applicable privileges, and/or doctor-patient privilege.

Date: 7/16/2025 _____/s/ _____ ERIKA L. LEE, the PLAINTIFF(proceeding as PRO SE)

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